



## MEMO ENDORSED

### UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,  
against  
MANUEL SALAZAR-ESPINOSA,  
Defendant.

05-cr-0517 (LAK)

*Motion denied by stay of filing  
for the reasons set forth by  
the Government in ECF No.  
SO ORDERED  
207 To whereby 10/26/24 was  
Filed - Lewis A. Kaplan*

LEWIS A. KAPLAN, USEI

6/1/23

#### **DEFENDANT'S EMERGENT MOTION FOR SENTENCE REDUCTION PURSUANT TO 18 U.S.C. §3582(c)(1)(A) COMPASSIONATE RELEASE**

**COMES NOW**, defendant, Manuel Salazar-Espinosa, ("Salazar/defendant"), by and through his attorney, Linda George, who does hereby move this Honorable Court for an Order reducing his sentence to time served and/or home confinement, based on the "extraordinary and compelling reasons" discussed below, pursuant to 18 U.S.C. §3582(c)(1)(A).

#### **INTRODUCTION**

Salazar is a 71 year old inmate of McRae Correctional Facility in McRae-Helena, Georgia,<sup>1</sup> who is suffering from multiple medical issues and health concerns. He has attempted to obtain the court's help on prior occasions as discussed below. Because his health has deteriorated further, and he is in peril of losing his vision, he renews his request. After serving 17 years of his 30 year sentence without incident, he is presently scheduled for release in July 2031. Defendant has satisfied the need to first seek administrative relief and he has an exit plan.

<sup>1</sup> 13WMAZ Staff, *Closure of CI McRae and thus defendant's redesignation is imminent*, October 28, 2022.

<https://www.13wmaz.com/article/news/local/private-prison-in-mcrae-to-close-and-lay-off-252-people/93-733591fd-42ec-4b16-85cd-7afc28983769> (last accessed November 9, 2022)